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Attorney for Defendant
IVAN MIRANDA-RIVERA

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,)	Case No. 2:20-cr-00242-KJM
)	
Plaintiff,)	
)	
vs.)	STIPULATION AND ORDER FOR
)	TEMPORARY SUBSTITUTION OF
IVAN MIRANDA-RIVERA)	DECLARATION AND UNSECURED BOND
)	IN LIEU OF TITLE TO VEHICLE
)	
Defendant.)	
)	

On May 14, 2021, this Court granted the defense motion to revoke the magistrate's detention order and ordered the release of Mr. Miranda-Rivera from custody following the posting of all bond documents, cash and property. CR 36. The Courtroom Deputy contacted the parties to advise that a release order would be signed following the Court's receipt and docketing of 1) Notice to Defendant; 2) Third Party Custodian Acknowledgement of Irma Lorena Silva Mendoza; 3) \$10,000 Appearance Bond, secured in cash by Carlos Elias Garcia Mendoza; 4) \$6,000 Appearance Bond, secured by the title to a vehicle belonging to Lorena Silva and Aureliano Silva Mendoza; 5) \$25,000 Unsecured Appearance Bond, cosigned by Mr. Miranda-Rivera and Francisco Javier Davalos; 6) \$50,000 Unsecured Appearance Bond, cosigned by Mr. Miranda-Rivera and Monica Cisneros; and 7) \$12,000 Appearance Bond, secure by the title to a vehicle belonging to Monica Cisneros.

As of the date of this stipulation, the Court has received all documents, cash and property ordered as conditions of release *with the exception of* the title to Ms. Cisneros' vehicle for the

1 \$12,000 property bond. Ms. Cisneros has advised defense counsel that the title was lost, and a
2 replacement has been ordered and processed, with an estimated arrival of 8-10 weeks. At the
3 request of defense counsel, the parties met and conferred regarding a temporary substitution for
4 the title, to allow Mr. Miranda-Rivera's release without further delay. The parties agree that a
5 declaration regarding the status of the title and an unsecured bond in the amount of \$12,000 is an
6 appropriate temporary substitution for the title, under these circumstances.

7 Ms. Cisneros has executed a declaration (attached hereto as Exhibit A) confirming that
8 she is the legal owner of the vehicle and that she has ordered a replacement title to the vehicle,
9 which is expected to arrive within 10 weeks, and which she will immediately forward to the
10 Clerk's Office upon receipt. Ms. Cisneros is further willing to execute an additional unsecured
11 bond for the \$12,000 value of the vehicle, until the title is posted.

12 It is therefore the request of the parties that the Court permit the temporary substitution
13 for the title, as described above, and sign an order releasing Mr. Miranda-Rivera upon the filing
14 subject to the special conditions contained in the Court's written order at CR 36.

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16 Dated: May 27, 2021

HEATHER E. WILLIAMS
Federal Defender

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18 /s/ Megan Hopkins
MEGAN HOPKINS
Assistant Federal Defender

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20 Attorney for Defendant
IVAN MIRANDA-RIVERA

21
22 Dated: May 27, 2021

PHILLIP A. TALBERT
Acting United States Attorney

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24 /s/ Samuel Stefanki
SAMUEL STAFANKI
Assistant United States Attorney

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26 Attorneys for Plaintiff
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1 ORDER

2 Good cause appearing, it is hereby ORDERED that the terms of Mr. Miranda-Rivera's
3 release are modified to temporarily substitute a signed declaration regarding the status of the title
4 to Monica Cisneros' vehicle and a \$12,000 unsecured bond in lieu of the title itself, until such
5 time as the replacement title can be posted. Following the posting of the additional unsecured
6 bond and the filing of the declaration on the record, the Court shall order Mr. Miranda-Rivera's
7 release on the following business day at 8:00 a.m.

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9 Dated: June 2, 2021

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11 CHIEF UNITED STATES DISTRICT JUDGE
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